Case 1:10-cr-01008-BMC-RER Document 30 Filed 12/06/11 Page 1 of 1 PageID #: 44 PAPA, DePAOLA and BROUNSTEIN

Attorneys at Law

42-40 Bell Boulevard Bayside, New York 11361 Suite 500

John P. Papa John R. DePaola Steven L. Brounstein (718) 281-4000 FAX (718) 281-4030 Madeline Wrzesc Legal Assistant

John K. Kouroupas Lawrence E. Kozar

VIA ECF

December 6, 2011

Honorable Ramon Reyes United States Magistrate Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re: <u>United States v. Anthony Colandra</u>

10 Cr. 1008(BMC)

Dear Judge Reyes:

I represent Mr. Colandra. Mr. Colandra's bail condition include home detention with electronic monitoring while allowing home to go to work. Mr. Colandra's daughter is attending SUNY Plattsburgh located at 101 Broad st., Plattsburgh, New York. I am respectfully requesting that Mr. Colandra be given permission to pick up his daughter at school and accompany her home for the holiday season. Plattsburgh is approximately an eight hour drive from New York City. With the Court's permission Mr. Colandra plans to leave the metropolitan area on December 15th and return on December 16th. He will stay at the Comfort Inn and Suites located at 411 Route 3, Plattsburgh, New York. His daughter will be returning to school on January 28th, and he is requesting permission to bring her back to school on the 28th returning on the 29th with the hope of staying at the same location. Mr. Colandra will provide his full itinerary to his supervising pre-trial service officer and of course immediately report to Pre-trial upon his return. I contacted Elizabeth Geddes the Assistant Untied States Attorney assigned to this matter and she has no objection regarding this application as long as Pre-trial Services is made aware oft this and approves the request.

I thanks the Court for considering this application.

Respectfully submitted;

PAPA, DEPAOLA & BROUNSTEIN

/s/

By: STEVEN L. BROUNSTEIN